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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 BARRY MICHAELS,
10
11 Plaintiff,

12 v.

13 LORETTA E. LYNCH, Attorney General of the
14 United States, in her official capacity; and
15 THOMAS E. BRANDON, Deputy Director,
16 Bureau of Alcohol, Tobacco, Firearms &
17 Explosives, in his official capacity,

18 Defendants.

Case No: 2:16-cv-00578-JAD-PAL

17 **DEFENDANTS' UNOPPOSED MOTION FOR**
18 **EXTENSION OF TIME TO RESPOND TO COMPLAINT**

19 Defendants hereby move for an extension of time up to and including July 25, 2016 in which to
20 respond to the complaint in this case. The current deadline is June 24, 2016. Plaintiffs' counsel has
21 consented to the extension of time. In support of this motion, Defendants state as follows:

22 Defendants requires additional time because counsel for Defendants was recently assigned to
23 this case, and because of the press of business and scheduling conflicts, including an evidentiary
24 hearing later this month. This motion is not sought merely for delay but in order that justice may be
25 served.
26

1 Based on the foregoing, Defendants respectfully request that their unopposed motion for an
2 extension of time be granted.

3 Respectfully submitted this 17th day of June 2016.

4 JOHN R. TYLER
5 Assistant Branch Director, Federal Programs
6 Branch

7 /s/ Daniel Riess
8 DANIEL RIESS
9 Trial Attorney

10 IT IS SO ORDERED:

11 
12 UNITED STATES DISTRICT JUDGE
13 UNITED STATES MAGISTRATE JUDGE

14 DATED: June 23, 2016
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PROOF OF SERVICE

I hereby certify that this **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** was served this date on all parties via electronic mail at the following address:

Michael E. Zapin
Law Offices of Michael E. Zapin
20283 State Rd 7, Ste. 400
Boca Raton, Florida 33498
michaelezapin@gmail.com
Counsel for Plaintiff

Dated this 17th day of June 2016.

/s/ Daniel Riess
DANIEL RIESS
Trial Attorney

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☐ FedEx Priority Overnight

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☐ FedEx Standard Overnight

Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

☐ FedEx 2Day A.M.

Second business morning. Saturday Delivery NOT available.

☐ FedEx 2Day

Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Express Saver

Third business day. Saturday Delivery NOT available.

5 Packaging

*Indicates when limit box.

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6 Special Handling and Delivery Signature Options

☐ SATURDAY Delivery

NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required

Package may be left without obtaining a signature for delivery.

☐ Direct Signature

Signature at recipient's address may sign for delivery. Fee applies.

☐ Indirect Signature

If no one is available at recipient's address, signature at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

☐ Does this shipment contain dangerous goods?

One box must be checked.

☐ No☐ Yes

See per attached shipping label.

☐ Yes

Shipped in accordance with Department of Transportation (DOT) regulations.

☐ Dry Ice

Dry Ice 5, UN1845

☐ Cargo Aircraft Only

7 Payment Bill to:

Sender's Account

☐ Recipient☐ Third Party☐ Credit Card☐ Cash/Check☐ Obtain recip.☐ Acct. No.

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Total Weight

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